

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

TERESA WATSON,

Plaintiff,

vs.

EAST ST. LOUIS SCHOOL DISTRICT NO. 189,

Defendant.

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Case No. 11-cv-632-MJR-SCW

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Comes now Defendant, East St. Louis School District No. 189, by and through its attorneys, Becker, Paulson, Hoerner & Thompson, P.C., and for its Memorandum in Support of Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56, states as follows:

1. Defendant is entitled to summary judgment on Plaintiff's Complaint because there are no genuine issues of material facts and Defendant is entitled to judgment as a matter of law.

2. Plaintiff has failed to present direct evidence of Defendant's discriminatory intent.

3. Defendant is entitled to summary judgment because Plaintiff has failed to establish *prima facie* cases of discrimination.

4. Defendant has articulated a legitimate, non-discriminatory, business reason for its employment decisions.

5. Plaintiff has failed to meet her burden to establish that Defendant's proffered reason for its employment decisions is merely a pretext for discrimination or retaliation.

6. Defendant adopts and incorporates by this reference its Memorandum in Support of Defendant's Motion for Summary Judgment filed contemporaneously herewith.

7. Since Plaintiff is *pro se* herein, Defendant requests pursuant to *Bryant v. Madigan*, 84 F.3d 246, 248 (7th Cir. 1996), that the Court adequately warn and admonish

Plaintiff that she must respond to Defendant's Motion for Summary Judgment with evidence of her own.

WHEREFORE, Defendant, East St. Louis School District No. 189, respectfully requests that this Court grant summary judgment on Plaintiff's Second Amended Complaint in its favor and against Plaintiff, and order such other relief as this Court deems just and proper.

BECKER, PAULSON, HOERNER & THOMPSON, P.C.

By: s/ Alan G. Pirtle
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December, 2013, I electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Teresa Watson
Post Office Box 24293
Belleville, Illinois 62223

By: s/ Alan G. Pirtle
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